OCCURRENCE REPORTING PROGRAM–PROPOSED INTERPRETATION PROCESS

Deleted: AND PROCESSING SYSTEM

Deleted:

For

ORPS Criteria and Requirements

By
EFCOG ORPS Criteria Interpretation
Task Team

March 2006

Proposed process for identifying, interpreting, and publishing DOE O 231.1A, DOE M 231.1-2, and DOE G 231.1 by DOE and DOE Contractor Organizations

Scope

The scope of this proposal includes a process to obtain interpretations to the requirements and criteria associated with the Occurrence Reporting and Processing System (ORPS). This paper delineates processes for gathering field issues related to ORPS, for DOE HQ to provide interpretation and guidance on the field issue, to publish and notify ORPS users of posted interpretations and guidance, and to identify and recommend relevant interpretations, guidance, and corrections for future publication in the 231 Manual and Guidance documents.

I am not sure we need the following statements because any interpretations should be based on the current orders, manuals, guides, and policies.
This process for criteria interpretation should be based on

- Recent draft changes of criteria in DOE M 231.1-2 that were identified during the Atlanta, Georgia 2004 ORPS Workshop.

- Formal interpretations made from DOE O 232.1A and 5000.3B that are still relevant and can map to the current criteria. .

Proposed Processes

- Set up an email listing available from the ORPS homepage (http://www.eh.doe.gov/paa/orps.html) of DOE contractor personnel with ORPS responsibilities. This is to replace the inactive Occurrence Reporting Listserver link. Similar to the previous listing, access to this list should be restricted to DOE and DOE Contractor personnel. The email listing will include the principal contact(s) from each contractor and will be used to communicate the rollout of the interpretation/guidance process. Later, the ORPS prime contractor list will be used to communicate pertinent information related to this process such as new information added to the DOE interpretations website or future ORPS Task Group meeting announcements. This process should support the automatic addition and deletion names to this mailing list. In addition, this process should provide a searchable alphabetic listing of the principle contacts from each contractor to facilitate peer to peer communication.

- Set up an on-line electronic form available from the ORPS homepage page for contractors to request interpretation/guidance of ORPS criteria and requirements. This electronic form should be similar to the proposed Criteria/Requirements Comment Submittal/Resolution Form found in Appendix A, which allows the contractor to identify the specific criterion or requirement in question, provide an

---

Margin change-tracking annotations:

Deleted: will
Deleted: will
Deleted: a
Deleted: a process
Deleted: and
Formatted: Font color: Red
Deleted: DOE EH-32
Deleted: the
Deleted: A
Deleted: be put in place to
Deleted: ally
Deleted: add and
Deleted: te
Deleted:
Deleted: This process should include an individual who will maintain the list and an electronic form for deletions/additions
Deleted: DOE EH-32
Deleted: web
Deleted: w
Deleted: the form used for the Atlanta ORPS workshop
Deleted: where
Deleted: will

explanation of the issue (examples if possible), a proposed interpretation, and Documents DOE's resolution.

- The interpretation form would be sent automatically to EH-32 via the ORPS support e-mail address (orpssupport@eh.doe.gov) for resolution. The subject matter expert review and formal interpretation should not take longer than 20 working days to determine final resolution. Once the interpretation/guidance has been approved, EH-32 will publish it onto their website as official interpretation/guidance. Regardless of the outcome of this determination feedback should be provided directly to the original submitter.
- All formal interpretation/guidance will be considered by EH-32 for future order, manual, and guidance revisions.

Once all elements of this process are put in place, an email will be sent to the primary contractor email listing to announce this process and invite usage of the process.

Definitions
I do not know of any that would be needed.
Do we need any??

| Deleted: and |
| Deleted: . |

| Deleted: an |
| Formatted: Default Paragraph Font |
| Deleted: (either a person or a special email account that several individuals can access) |
| Deleted: interpretation or guidance. |
| Deleted: S |
| Deleted: The interpretation/guidance request form would be forwarded to the appropriate DOE HQ SME. |
| Deleted: ME |

References

Occurrence Reporting and Processing of Operations Information, DOE M 231.1-2
Occurrence Reporting and Performance Analysis Guide, DOE G 231.1-1
Occurrence Reporting Causal Analysis Guide, DOE G 231.1-2

Appendix A

Criteria/Requirements Comments Submittal Form

Site: _____ **Submitter's Name: _____** **Date:_____**

Organization: _____ **Phone: _____**

E-Mail: _____

#	Approved Criterion / Requirement	Proposed Resolution	Example of Problem	DOE Approved interpretation